

# TECH MEMORANDUM

## Utah Coal Regulatory Program

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#3222  
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April 29, 2009

TO: Internal File

THRU: Jim Smith, Permit Supervisor, Environmental Scientist III, Hydrology  
April Abate, Team Lead, Environmental Scientist III, Geology

FROM: Peter Hess, Environmental Scientist III, Engineering

RE: MRP Update, Savage Services Corporation, Savage Coal Terminal,  
C/007/022, Task ID #3222

JL 6/15/09  
GAC 6-11-2009

PHH mjs

### SUMMARY:

The Permittee, through Blackhawk Engineering Company, and at the request of the Division, submitted an updated version of the mining and reclamation plan to R645 Coal Mining Rules formatting on April 9, 2008. This Task was identified as TID # 2955.

Task ID # 2955 was reviewed and returned to the applicant with a list of deficiencies on December 1, 2008. Mr. Wayne H. Western conducted the first engineering review, and required a response for six remaining deficiencies.

The Permittee responded on March 2, 2009; this new application has been identified by the DOGM as Task ID # 3222 for review purposes.

### TECHNICAL ANALYSIS:

## ENVIRONMENTAL RESOURCE INFORMATION

### PERMIT AREA

Regulatory Requirements: 30 CFR 783.12; R645-301-521.

### Analysis:

The Division identified this deficiency in the Task ID # 2955 technical analysis;

**R645-301-521.190**, The Permittee must include in the MRP a table that shows the number of permitted and disturbed areas and whether they are owned by the Federal government, State government, local government or private persons. The Division needs that information for reports that go to OSM.

The deficiency response submitted by the Permittee and identified as Task ID # 3222 contains a revised Chapter 5 Engineering page 30, Section 521.190 which lists the following acreages requested by the Division;

Permitted Acres	-	153.46 ac.
Disturbed Acres	-	132.50 ac.
Pre-Law Disturbance	-	77.20 ac.
Post-Law Disturbance	-	55.30 ac.
Ownership (Surface)	-	All Private

This information meets the requirements of and adequately addresses R645-301-521.190.

#### **Findings:**

The submitted information adequately addresses the requirements of R645-301-521.190.

## **OPERATION PLAN**

### **SIGNS AND MARKERS**

Regulatory Reference: 30 CFR Sec. 817.11; R645-301-521.

#### **Analysis:**

Two deficiencies were identified in the Task ID # 2955 technical analysis which are relative to signs and markers;

- 1) **“R645-301-521.252**, the Permittee must commit to placing perimeter signs around the permit boundaries rather than state that the permit boundaries are shown on a map”, and
- 2) **“R645-301-527.270**, the Permittee must commit to place topsoil markers on topsoil piles rather than state what the signs will look like”.

The Permittee's response, identified as Task ID # 3222, and received on March 2, 2009 (See Chapter 5, page 31, Section 521.252) states the following; "the perimeter of the permit area is clearly marked." (See Plate 5-2). The response to the deficiency is as follows; "Perimeter signs and markers are placed around the permit boundaries as required".

The Permittee's response to deficiency #2, as listed above contains the following; "All topsoil and subsoil piles are clearly marked with the signs ", (identified on Figure 5-2).

Both deficiencies have been adequately addressed by the Permittee's responses.

### **Findings:**

The Permittee's March 2, 2009 (Task ID # 3222) response to the aforementioned deficiencies adequately addresses the requirements of the R645 Coal Mining Rules for signs and markers.

## **EXISTING STRUCTURES:**

Regulatory Reference: 30 CFR 784.12; R645-301-526.

### **Analysis:**

The technical analysis for Task ID # 2955 identified the following deficiency;

**R645-301-526.100**, The Permittee did not meet the requirements of this section. R645-301-526.100 deals with structures that were used for coal mining and reclamation and were constructed prior to January 21, 1981. The main reason for this regulation is to show that structures constructed before January 21, 1981 meet the performance standards even if they do not meet the design standards.

The Permittee's response (Task ID # 3222) contains a revised Chapter 5, page 32, Section 526.120 which contains a list of all structures constructed prior to January 21, 1981. The list appears to indicate that all site activity was initiated on or about October 1977. In general all of the original structures and structure locations are still in service. Additional conveyors have been added in order to increase the storage and blending capability of this facility.

All structures are maintained in order to meet the requirements of the R645 Coal Mining Rules and 30 CFR Part 77, Surface Areas for Underground Mines.

**Findings:**

The submitted information meets the performance standards of the R645 Coal Mining Rules.

**ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES**

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

**Analysis:**

**Road Classification System**

The technical analysis for Task ID # 2955 identified the following deficiency;

**R645-301-527.100**, The Permittee must classify each road as primary or ancillary. The Permittee can not make general statements such as the one in Chapter 5 page 6 "All other roads on the site are considered Ancillary Roads". The Permittee must state what the ancillary roads are used for (i.e., for what purpose is each ancillary road).

The Task ID # 3222 response contains the following in Section 511.100, Chapter 5, page 6, under Proposed Operations / Transportation Facilities / Roads; "the following are considered 'Ancillary Roads' as shown on Plate 5-4; AR-1, AR-2, AR-3 and AR-4."

The purpose and / or need of each of the four ancillary roads is also stated with this revised information.

This information adequately addresses the deficiency identified under **R645-301-527.100**, Classification of Roads.

**Findings:**

The Permittee has adequately addressed this deficiency, as identified in the Task ID # 2955 technical analysis.

# RECLAMATION PLAN

## MINE OPENINGS

Regulatory Reference: 30 CFR Sec. 817.13, 817.14, 817.15; R645-301-513, -301-529, -301-551, -301-631, -301-748, -301-765, -301-748.

### Analysis:

The technical analysis for Task ID # 2955 identified the following deficiency;

**R645-301-529**, The Permittee must address the closure of all underground openings including wells. The comment that the site is a surface mine is insufficient.

The Division incorrectly identified this deficiency under 301-529, as none of the wells at this site penetrate a developed deep coal mine.

The deficiency should have been identified under **R645-301-765, Casing and Sealing of Wells**.

Chapter 7, page 120, Section 765 (Task ID # 2955) references Section 540 and 748 for details on the sealing of wells.

Section 540 is the Reclamation Plan for this site.

Section 748 states that all decommissioned water monitoring wells have been plugged and sealed as approved by the Division.

Two new water monitoring wells (S-1-GW and S-2-GW) were required as part of the approval process for the construction of the four fine coal settling basins located NNE of main administration building (Task ID # 2613, approval date 3/21/2007).

The Permittee is aware that all monitoring wells must be plugged for their entire depth, and this commitment has been previously implemented as part of the approved reclamation plan. Wells S-1-GW and S-2-GW will be reclaimed in a similar fashion.

The currently approved reclamation plan is adequate for wells S-1-GW and S-2-GW.

**Findings:**

The currently approved reclamation plan is adequate for the two existing ground water monitoring wells at the Savage Coal Terminal site.

**RECOMMENDATION:**

The four deficiencies identified by technical analysis # 2955 have been adequately addressed. Task ID # 3222 should be approved.

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